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(Additional Counsel on next page)

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA

MORRIS BICKLEY, MICHAEL D.  
PATTON, RAYMOND GREWE, DENNIS  
VANHORN, and DOUGLAS PUMROY,  
individually and on behalf of all others  
similarly situated,

Plaintiffs,

v.

SCHNEIDER NATIONAL CARRIERS,  
INC., a Nevada corporation, and DOES 1 to  
10, inclusive,

Defendants.

Case No. 3:08-cv-05806-JSW

CLASS ACTION (FRCP 23)

JOINT STIPULATION AND  
~~PROPOSED~~ ORDER CONTINUING  
DEADLINES

Hon. Jeffrey S. White  
Courtroom 2 (17<sup>th</sup> Floor)

Complaint Filed: November 25, 2008  
Trial Date: August 6, 2012

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1 Plaintiffs Michael Patton, Morris Bickley, Raymond Grewe, Dennis Vanhorn, and  
2 Douglas Pumroy (“Plaintiffs”) and Defendant, Schneider National Carriers Inc. (“Defendant”)  
3 (hereinafter collectively, the “Parties”), by and through their counsel of record, hereby stipulate  
4 and agree as follows:

5 WHEREAS, on May 18, 2011, the Court issued its Order granting the Parties’ Stipulation  
6 to File Consolidated Fourth Amended Complaint (Docket No. 90);

7 WHEREAS, on May 18, 2011, the Plaintiffs filed their Consolidated Fourth Amended  
8 Complaint (Docket No. 91);

9 WHEREAS, the Consolidated Fourth Amended Complaint added a new named Plaintiff  
10 (Pumroy) and several factual allegations and/or edits;

11 WHEREAS, Schneider intends to take further written discovery regarding such new  
12 allegations and from the new named Plaintiff;

13 WHEREAS, the Parties agree that, in addition to the maximum number of interrogatories  
14 provided in FRCP 33(a), Schneider may issue one additional contention interrogatory to each  
15 named plaintiff that requests all facts which support each plaintiff’s contentions as to the new  
16 factual allegations in the Fourth Consolidated Amended Complaint.

17 WHEREAS, Schneider needs an additional 30 days built into the current schedule  
18 regarding class certification to conduct such discovery;

19 WHEREAS, after the parties have had an opportunity to meet and confer  
20 further, Plaintiffs expect to submit a separate request or stipulation regarding the structure of  
21 their motion(s) for class certification;

22 WHEREAS, the Parties do not wish to alter the dates currently set for completion of  
23 mediation (January 27, 2012) or the further Case Management Conference currently scheduled  
24 for February 17, 2012;

25 WHEREAS, the Parties agree that the following dates currently set by the Court’s April  
26 1, 2011 case management Order (Docket No. 84) should be continued as follows:

27 Class certification discovery cutoff: From 07/25/11 to 08/24/11;

28 Last day to file Class cert. motion: From 08/05/11 to 09/06/11;

1 Opposition due: From 09/16/11 to 10/17/11;  
2 Reply due: From 10/14/11 to 11/14/11;  
3 Hearing on class cert motion: From 11/18/11 @ 9:00 am to  
4 12/16/11 at 9:00 am (or as soon thereafter as may be  
5 convenient for the Court).

6 NOW THEREFORE, IT IS HEREBY STIPULATED by the Parties herein, through their  
7 counsel of record, that the Court should amend the schedule in this action according to the dates  
8 and times set forth above in pages 4:27 to 5:5 above.

9 IT SO STIPULATED

10  
11 DATED: May 25, 2011

**MARLIN & SALTZMAN  
THE CULLEN LAW FIRM  
LAW OFFICES OF PETER M. HART  
LAW OFFICES OF KENNETH H. YOON  
LAW OFFICE OF ERIC HONIG**

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16 By: \_\_\_\_\_/s\_\_\_\_\_  
Christina A. Humphrey, Esq.  
17 Attorneys for Plaintiffs

18 DATED: May 25, 2011

**HAGENS BERMAN SOBOL SHAPIRO**

19  
20 By: \_\_\_\_\_/s\_\_\_\_\_  
Lee M. Gordon, Esq.  
21 Attorneys for Plaintiffs

22 DATED: May 25, 2011

**OGLETREE, DEAKINS, NASH, SMOAK  
& STEWART, P.C.**

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25 By: \_\_\_\_\_/s\_\_\_\_\_  
Michael J. Nader, Esq.  
26 Attorneys for Defendant SCHNEIDER  
27 NATIONAL CARRIERS, INC.  
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**[PROPOSED] ORDER**

GOOD CAUSE APPEARING, IT IS SO ORDERED. IT IS FURTHER  
ORDERED THAT THE HEARING ON ANY MOTIONS REGARDING CLASS  
CERTIFICATION SHALL BE ON January 6, 2012 at 9 a.m.

DATED: May 26, 2011

  
Hon. Jeffrey S. White